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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 VIRGINIA GUEVARA,) Civil No. 1:22-cv-00490-BAK (EPG)
13)
14 Plaintiff,)
15) STIPULATION AND ORDER FOR
v.) EXTENSION OF TIME TO RESPOND
16) TO PLAINTIFF'S COMPLAINT
KILOLO KIJAKAZI,)
17 Acting Commissioner of Social Security,) (ECF No. 11)
18 Defendant.)
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1 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security
2 (the "Commissioner"), shall have an extension of time to respond to Plaintiff's Complaint in this case.

3 In support of this request, the Commissioner respectfully states as follows:

4 1. Defendant's response to Plaintiff's Complaint is due July 25, 2022. Defendant has not
5 previously requested an extension of this deadline.

6 2. The certified administrative record (CAR) in this case has not been finalized for filing.
7 The agency's Office of Appellate Operations (OAO) is responsible for preparation of CARs. Counsel
8 for the Commissioner is in contact with OAO to ensure that the CAR is properly certified for filing.
9 Accordingly, Defendant requests an extension of 60 days to respond to Plaintiff's Complaint.

10 3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that he
11 has no objections.

12 4. This request is made in good faith and is not intended to delay the proceedings in this
13 matter.

14 WHEREFORE, Defendant requests until September 23, 2022, respond to Plaintiff's Complaint.

15 Respectfully submitted,

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17 Date: July 26, 2022

PEÑA & BROMBERG, PLC

18 By: /s/ Jonathan Peña *

19 JONATHAN PEÑA

20 *Authorized by email on July 26, 2022

Attorneys for Plaintiff

21 Date: July 26, 2022

PHILIP A. TALBERT

22 United States Attorney

23 Eastern District of California

24 By: /s/ Oscar Gonzalez de Llano

OSCAR GONZALEZ de LLANO

25 Special Assistant United States Attorney

26 Attorneys for Defendant
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ORDER

Pursuant to parties' stipulation (ECF No. 11), IT IS ORDERED that Defendant shall have until September 23, 2022, to file the certified administrative record or otherwise respond to the complaint. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **July 26, 2022**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE